

154102

This installation is a publicly-owned treatment plant which receives industrial sewage which has been mixed in sewers with wastewater from certain industries. The treatment plant generates four (4) waste streams: sludge, oil skimmings, lime grit, and assorted trash and debris. These waste streams are not, we believe, covered by the listings contained in Section 261, Sub-part B. We have endeavored to identify however, the wastes from "non-specific sources," including wastes received by the plant via interceptor sewers carrying domestic and industrial wastewater; but there may be wastes listed in Section 261.31 of which we are not aware. Furthermore, although these waste streams may contain one or more of the substances listed in Appendix VIII to Section 261, based upon our knowledge and testing of the waste streams, ~~only the sludge appears to~~ ^{they do not appear to} meet the criteria of Sub-part C for classification as a hazardous waste. Lime grit from the plant has a pH of approximately 12.5, but is a solid and, we believe, not ~~intended to be~~ covered by Section 261.22. Nevertheless, we request that the U.S. EPA assign a number to these four (4) waste streams, even though they may not be "hazardous."

RCRA NO.

1. Sludge
2. Oil Skimmings
3. Lime Grit
4. Trash & Debris